

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Zachary Brown

Case No.: 1:25-mj-30279

Judge : Morris, Patricia T.

File Date : 5/2/2025

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 14, & 15, 2025 in the county of Midland in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C § 115(a)(1)(B)

Offense Description

Threatens to assault, kidnap, or murder, a United States official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under [18 U.S.C. § 1114] ... with intent to impede, intimidate, or interfere with such official, judge, or law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 2, 2025

City and state: Flint, Michigan



Complainant's signature

Special Agent, Christopher Kiah DHS/FPS

Printed name and title



Judge's signature

Hon. Curtis Ivy, Jr., U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Christopher Kiah, being first duly sworn, depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Department of Homeland Security, Federal Protective Service (“DHS/FPS”) and have worked with DHS/FPS since January of 2012. I am assigned to the Region 5 Investigation’s Branch, Cleveland Field Office, and I am responsible for the State of Ohio and the State of Michigan. I hold a Bachelor of Science Degree with a major in Criminal Justice from Park University. I am a graduate of the Criminal Investigator Training Program and the Federal Protective Service Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. Previously, I worked as an Inspector for DHS/FPS and a Criminal Investigator for the United States Marine Corps Criminal Investigation Division.

2. As a DHS/FPS Special Agent, I routinely conduct investigations related to the protection of federal property, persons on such property, and federal employees. I frequently investigate violations of federal law, including violations of 18 U.S.C. § 115 (“Whoever ... threatens to assault, kidnap, or murder, a United States official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under [18 U.S.C. § 1114] ... with intent to impede, intimidate, or interfere with such official, judge, or law enforcement

officer while engaged in the performance of official duties, or with intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties ...”).

3. I base this affidavit on my personal investigation and information provided by other sources, including other law enforcement officers and investigations.

4. The information set forth in this affidavit is for the limited purpose of establishing probable cause in support of a criminal complaint alleging that ZACHARY BROWN (DOB: xx/xx/1984), hereinafter referred to as “BROWN”, violated 18 U.S.C. § 115(a)(1)(B) (“Whoever ... threatens to assault, kidnap, or murder, a United States official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under [18 U.S.C. § 1114] ... with intent to impede, intimidate, or interfere with such official, judge, or law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties ...”).

II. APPLICABLE LAW

5. 18 U.S.C. § 115(a)(1)(B) – “Whoever ... threatens to assault, kidnap, or murder, a United States official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under [18

U.S.C. § 1114], with intent to impede, intimidate, or interfere with such official, judge, or law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties, shall be punished as provided in subsection (b).”

6. 18 U.S.C. § 1114 – “Whoever kills or attempts to kill any officer or employee of the United States or of any agency in any branch of the United States Government (including any member of the uniformed services) while such officer or employee is engaged in or on account of the performance of official duties, or any person assisting such an officer or employee in the performance of such duties or on account of that assistance ...”

III. PROBABLE CAUSE

7. On April 25, 2025, I was assigned to the BROWN investigation after a Social Security Administration (“SSA”) Online Disability Claim, Form 3368, was received by VICTIM 1, on April 21, 2025. VICTIM 1 is employed by the SSA office and was engaged in the performance of their official duties on April 21, 2025, when reviewing BROWN’s online disability claim submission, and is a federal employee for the purposes of 18 U.S.C. § 1114.

8. By way of background, the Saginaw SSA office is located at 611 E. Genesee Ave., Saginaw, MI, within the Eastern District of Michigan, and is the

servicing office for BROWN, who resides at 303 Hamilton St, Apartment E, Coleman, MI 48618.

9. The SSA offers an option for members of the public to submit disability applications online, by visiting www.ssa.gov. This allows members of the public access to SSA services from anywhere and conveniently allows members of the public to submit disability claims without having to visit an SSA office or wait for an appointment with an SSA employee to submit their disability claims.

10. On April 14, 2025, BROWN submitted a disability claim using the online SSA submission process. In Section 1 of the submission, BROWN provided Personally Identifiable Information “PII”, including his full name, social security number, current address, email address, and phone number.

11. BROWN also provided additional PII in his submission, including specific information about his medical history, work history, and education history.

Section 8 of the document pertains to medical treatment received by BROWN.

Within that section, BROWN wrote:

“so now your saying I never went to the appointment when I did someones gotta pay for this ... your lucky I cannt afford insurance and lost my vehicle or saginaw ssa employess [sic] would be getting a taste of what happens when you break the law agaiasnt a patriot.”

12. Section 11 of the document provides an area for claimants to provide any additional information pertinent to their disability claim. Within that section, BROWN wrote:

“you have been un lawfully stealing 380 bucks a month from me changing my address multiple time ... when i appeal i don’t receive the letter back or a response don’t be surprise when you push a man with nothing to the point of nothing to lose that he doesn’t freak the fuck out at the saginaw county SSA ... im ready to kill over the fact that they changed my address ... im sure if I have to deal with those responsible at SSA Saginaw I Will FUCKING SNAP AND THEY WILL END UP REGRETTING WHAT THEY HAVE DONE UN LAWFULLY TO ME AND MY CASE YOU HAVE MADE MY MENATL PROBLEMS WORSE AND I AM ON THE FUCKING EDGE ,, I hate to hurt people but they have brokewn the law and reduced my money with no way to fight ... AND THEN TO DEAL WITH CRAPPY TAKING SSA AGENTS ON THE PHONE AND YALL WONDER WHY PEOPLE SNAP WILL THIS IS WHY ... IF I DONT KILL MYSELF I MIGHT DECIDE TO TAKE IT OUT ON THOSE WHO ARE CAUSING ADDED DISTRES TO MY ALREADY FUCKED UOP LIFE AND THAT WOULD BE BE WHO EVER IS IN CHARGE OF MY CASE AT SAGINAW SSA ...”

13. BROWN also submitted information as part of his disability claim that populated into the SSA “ICLM” document. In the remarks section of the ICLM document, BROWN wrote:

“I have been disabled since 2015 corruption with SSA Agents from Saginaw Michigan started when they reduced my money in half ... im gonna kill.”

14. During this investigation, I also learned on April 15, 2025, at approximately 10:20 a.m., BROWN telephonically contacted the Saginaw SSA office, seeking to discuss his SSA disability benefits. BROWN called the general

Saginaw SSA telephone number, 877-405-XXXX, from telephone number 989-933-XXXX, and was connected with VICTIM 2. VICTIM 2 is employed by the SSA office and was engaged in the performance of their official duties on April 15, 2025, when speaking with BROWN, and is a federal employee for the purposes of 18 U.S.C. § 1114.

15. At the time of the call, VICTIM 2 was unaware BROWN had submitted an online disability claim on April 14, 2025, and as a result, was unaware of the threats made by BROWN in the online submission.

16. After identifying BROWN, VICTIM 2 stated BROWN called in to discuss the stoppage of his benefits and VICTIM 2 advised BROWN that the SSA could send him paperwork in the mail, or he could visit the Saginaw SSA office to obtain the paperwork for his disability reconsideration. VICTIM 2 stated BROWN then said, “If I come down there, I’m going to hurt somebody.” VICTIM 2 stated they confronted BROWN about his verbal threat, and BROWN denied the threat before the call was ended.

17. Through use of law enforcement databases, I learned telephone number 989-933-XXXX, is an active wireless telephone number and registered to BROWN.

18. As a matter of record and through various sources of information, I learned BROWN has a violent criminal history involving assaultive behavior and has been known to carry weapons.

IV. CONCLUSION

19. Based on the foregoing, probable cause exists that ZACHARY BROWN, has violated 18 U.S.C. § 115(a)(1)(B), “threatens to assault, kidnap, or murder, a United States official, a United States judge, a Federal law enforcement officer, or an official whose killing would be a crime under [18 U.S.C. § 1114] ... with intent to impede, intimidate, or interfere with such official, judge, or law enforcement officer while engaged in the performance of official duties, or with intent to retaliate against such official, judge, or law enforcement officer on account of the performance of official duties ...”



Christopher Kiah
Special Agent, DHS/FPS

Sworn to via telephone after submission by reliable electronic means on this 2nd day of May 2025.



Hon. Curtis Ivy, Jr.
United States Magistrate Judge